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FILED
07 JUL -2 AM 10:06
RICHARD W. HILKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

NORCA INDUSTRIAL, LLC, a New York
Limited Liability Company,

Plaintiff,

v.

ROBERT WREN, an individual; PRIMROSE
METALS, INC., a California corporation;
RICHARD RAYBIN, an individual; LIFETIME
CAPITAL GROUP, an unknown entity;
VICTORIA PICCOLOTTI, an individual;

Defendants.

CASE NO. C 07 3425 EDL

**DECLARATION OF ROBERT
BLUMENKRANTZ IN SUPPORT
OF PLAINTIFF'S EX PARTE
APPLICATION FOR
TEMPORARY RESTRAINING
ORDER, PRELIMINARY
INJUNCTION AND EXPEDITED
DISCOVERY**

Date: July 2, 2007

Time: 10:00 a.m.

Room: Clerk's Office, 16th Flr.

ROBERT BLUMENKRANTZ declares:

1. I am a vice president of plaintiff Norca Industrial LLC, a New York limited liability company (hereafter "Norca"). I have at all times worked at Norca's headquarters office, located in Great Neck, New York. The facts stated in this declaration are based upon my personal knowledge, except where stated to be on information and belief, and as to those, I believe it to be true.

2. On or about June 6, 2007, I had a telephone conversation with Steve Song, a buying agent associated with Norca. I requested that he travel to Norca's office in New York to meet with management. Mr. Song became upset and said that he shouldn't have to come to New York. The next day I had a further telephone call with Mr. Song, in which he announced that he was quitting as Norca's agent, effective immediately.

3. As a vice president, I am familiar with Norca's handling of Requests for Quotes ("RFQ") received from customers and potential customers.

4. On or about June 12, 2007, I spoke with the Manager - Regional Procurement for one of Norca's long-standing customers. He advised me that he was sending me an RFQ to quote. He also advised me that he had already been contacted by Bob Wren and was aware of the existence of Primrose Metals. I received the RFQ that same day. It was dated June 1, 2007, and stated that the deadline to provide a responsive quote was June 11, 2007. A true and correct copy of the portions of the RFQ reflecting such information is attached hereto as Exhibit A.

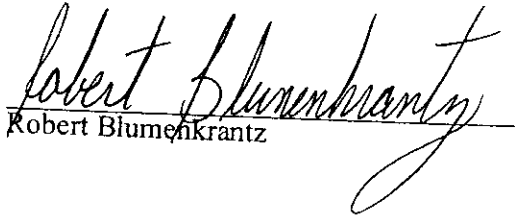
5. Based on my knowledge of Norca's past practices, and Norca's relationship and prior dealings with this customer, this RFQ would have been sent to Bob Wren on June 1st. Mr. Wren never disclosed to me, nor to my knowledge any other Norca official, that he had received this RFQ.

6. Upon learning of this RFQ, on June 12th, I immediately solicited a quote from our primary manufacturer (Changwon in Korea) and on June 14th, submitted a late quote to this customer in response to the RFQ. (Changwon has recently changed its name to "Posco Speciality Steel Co. Ltd.") I spoke with the customer later that day, who told me that Primrose Metals had earlier submitted a quote from the same mill in response to this RFQ. When I spoke

1 with this customer several days later, he told me that Primrose Metal's quote was 9% lower than
2 Norca's. This was a substantial RFQ, in excess of \$3.0 Million.

3 I declare under penalty of perjury under the laws of the United States of America that the
4 foregoing is true and correct.

5
6 Executed on: June 28, 2007

7 
Robert Blumenkrantz

REDACTED

REQUEST FOR QUOTATION

6/1/07

Attn:

Ph:

Fx:

SUBJECT: REDACTED **Proposal No.** REDACTED

Request For Quotation # REDACTED for SS Tube

Gentlemen:

Please provide a quotation for the subject commodities to meet the requirements described in this Request for Quotation [RFQ] **no later than June 11, 2007 or sooner** (i.e. the bid due date). By the close of business on the bid due date supply your complete quotation must be received at our offices. If you choose not to provide a quotation, please return this RFQ package accompanied by a brief explanation of your reasons for declining to quote.

REDACTED

EXHIBIT A